

000039606

DOORRES CONTROL
OUTGOING LTR NO

EG&G ROCKY FLATS

ORDER# 4700,1
4 RF 08756

EG&G ROCKY FLATS, INC
ROCKY FLATS PLANT, P O BOX 464, GOLDEN, COLORADO 80402 0464 • (303) 966 7000

DIST	LTR	ENC
ARAL, M E		
IRLINGAME, A H		
SBY, W S		
ANCH, D B		
ARNIVAL, G J		
VIS, J G		
RRERA, D W		
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DAHL, T		
LBIG, J G		
JCHINS, N M		
CKSON, D T		
LL, R E		
JESTER, A W		
ARX, G E		
DONALD, M M		
KENNA, F G		
ONTROSE, J K		
ORGAN, R V		
OTTER, G L		
ZZUTO, V M		
SING, T L		
ANDLIN, N B		
HWARTZ, J K		
TLOCK, G H		
EWART, D L		
TIGER, S G		
DBIN, P M		
DORHEIS, G M		
ILSON, J M		
T M, LINDSEY	✓	✓
T C, MASI	✓	✓
T J, P-W	✓	✓
DOORRES CONTROL	X	X
ADMIN RECORD/080		
TRAFFIC		
ATS/T130G		

August 23, 1994

94-RF-08756

D George
Environmental Restoration Division
DOE/RFPO

TRANSMITTAL OF AGENCY INTERFACE MEETING - LJP-003-94

Action None required

I am enclosing minutes from a meeting held on August 15, 1994, regarding landfill closure and leachate collection in Operable Unit 7 (OU 7). The Environmental Protection Agency (EPA), the Colorado Department of Public Health and Environment (CDPHE), the Department of Energy (DOE), EG&G and subcontractor representatives were in attendance. Also enclosed are the handwritten notes taken during the meeting which were reviewed and signed by the parties involved.

The following three items are of direct concern to the project, and require written agency verification of verbal guidance:

- 1) that CCR Health/Title 6 1007-2 Part 2 siting requirements for Hazardous Waste Sites do not apply to the landfill closure design,
- 2) that wetland mitigation will be conducted during landfill closure and not separately for the leachate collection system, and
- 3) that soil excavated during the construction of the leachate collection system can be placed within the IHSS without triggering Land Disposal Regulations

If you have any question or comments on these issues or the enclosed minutes, please contact me at 966-8553

CLASSIFICATION	
CNI	
UNCLASSIFIED	✓
CONFIDENTIAL	
SECRET	
AUTHORIZED CLASSIFIER	
SIGNATURE	N/A
DATE	
REPLY TO RFP CC NO	N/A
ATION ITEM STATUS	
PARTIAL/OPEN	
CLOSED	
R APPROVALS	
IG & TYPIST INITIALS	LJP-W/GB

Laure J Peterson-Wright
Operable Unit 7 Project Manager
Group 2 Closures

LJP cb

Orig and 1 cc - D George

Enclosure
As Stated

ADMIN RECORD

A-DU07-000295

**OPERABLE UNIT 7 AGENCY INTERFACE MEETING
JULY 15, 1994**

Meeting Objectives:

Receive further guidance with respect to the Leachate Collection System and related regulatory concerns

Discuss the comment resolution summary to expedite CDPHE and EPA approval of the work plan technical memorandum and the field sampling plan

Discuss the logic and schedules of the Leachate Collection Accelerated Action and the Landfill Closure

**1) Comment Responsiveness Summary for the Technical Memorandum/
Revised Work Plan**

Comment 11, Page , (CDPHE), Suggests re-examining the well placements northeast and southeast of the Landfill

- The placement of the wells will be re-examined and a justification of well locations will be provided

Comment 7 page 14 (CDPHE), Recommends characterization of valley-fill alluvium downgradient of the Landfill

- DOE will characterize of one well in the down-gradient cluster to provide more information regarding the valley-fill alluvium. Samples will be composited in two foot intervals to the water table

General Comment (CDPHE&E), Are the data values of pairs exceeding the RPD criteria near the detection limit or near a critical value (ARAR, PRG)?

Data that exceeded the EPA's 35% RPD criteria for soil will be re-examined to determine the impact on further uses of the data

Comment 9, Page 24, (CDPHE&E), Recommends that trend charts and upgradient downgradient well comparisons be provided as an appendix to the document if not a time-intensive effort

- If it is not time-intensive, DOE/EG&G will add trend charts and upgradient/downgradient information to the Technical Memorandum. If the effort proves too time intensive, a summary will be provided and trend charts and upgradient/downgradient well comparison will be presented in the IM/IRA/DD

Comment 38, Page 41 (CDPHE), Will the wells be sampled only one month?

- The wells will be sampled monthly for four months and QC samples will be collected

General Comment (PRC), If sandstone is encountered during drilling, drawdown tests should be performed to determine hydraulic conductivity

- If sandstone is encountered during borings, drawdown tests will be performed to determine hydraulic conductivity

General Comment (CDPHE), Is the dam a suitable migration boundary for final closure?

- DOE/EG&G will present available data supporting the conclusion that the integrity of the dam as a migration boundary is acceptable for final closure at the August 25, 1994, Interface Meeting

Comment 4 Page 11, (EPA), Recommends that the sentence relating presumptive remedy to fate and transport be removed

- The sentence linking presumptive remedy to fate and transport will be removed

Comment 7, Page 14,(EPA), Recommends that the sentence be reworded to provide a conclusion

- The response will be reworded to provide a more definitive conclusion

Comment 9, Page 16 (EPA), Is concerned that all data required to support final closure has not be collected

- DOE/EG&G will review available data to determine if there are any further data needs with respect to final closure activities, esp placement of groundwater migration barriers and present their findings at the August 25, 1994 Interface Meeting

Comment 14, Page 31, (PRC) Why weren't matrix spikes collected for other media?

- GT 02 references the project plan for the specific frequencies of QA/QC sample collection for surficial soils The OU 7 Quality Assurance Addendum (Chapter 10 of the Final Phase I RFI/RI Work Plan) did not require matrix spikes for surficial soils This plan was reviewed and approved by EPA and CDPHE

2) Clarification of the Intended Scope of the Leachate Collection System

- A conceptual design to support final closure was presented and accepted by CDPHE and EPA The design will collect surface and subsurface leachate

3) The Landfill Closure and Leachate Collection Schedules.

- Task 1230800341 (Leachate Accelerated Action) will be shortened to a 5 day duration
- Task 1230200390 (Landfill Closure) will be shortened because of the adoption of presumptive remedy
- EPA will discuss the possibility of concurrent DOE/EPA/CDPHE with EPA management It is DOE's position that DOE should review all documents prior to release to EPA and CDPHE for review

4) The proposed Action Memorandum.

- The proposed Action Memorandum outline and selected draft sections will be presented at the August 25, 1994, Interface Meeting and discussed at that time

5) Completeness requirements of Leachate Collection System Design for the Action Memorandum.

- CDPHE/EPA/DOE agreed that although the PAM guidance doesn't specify the completeness requirement, a 95% complete design will be presented for OU 7

6) Do CCR Health/Title 6, 1007-2 part 2 siting requirements for Hazardous Waste Disposal Sites apply to the landfill closure design?

- CDPHE remarked that the requirements do not apply to this closure

7) Is wetland mitigation required separately for the Leachate Collection System?

- EPA clarified that wetland mitigation for the Leachate Collection system should take place during wetland mitigation for Landfill Closure

8) Does moving excavated soils within an IHSS constitute placement?

- CDPHE and EPA both agreed that moving the excavated soils from the Leachate collection system construction would not be considered placement and trigger LDR requirements

9) Review and Approval of Meeting Minutes

Dave Norbury - CDPHE
Arturo Duran - EPA
Dave George - DOE
Laurie Peterson-Wright - EG&G

8) Issues and Actions

- 1 EG&G will make changes to OU 7 activity schedules
- 2 EG&G/DOE will gather information on the dam's structural integrity and present at the Agency Interface Meeting August 25, 1994
- 3 At the Agency Interface Meeting August 25, 1994, EG&G/DOE will present information concerning the data requirements for placement of a groundwater diversion/intercept system

Agenda
August 15, 1994

Several items will be discussed during the meeting with CDH/EPA/DOE

1) The Comment Responsiveness Summary for the Technical
Memorandum/Revised Work Plan,

1. Placement of wells - comment 11 ^{and will revisit}
EG&G will provide a better justification of the ^{placement}
N:5 wells.
2. Characterization of soil materials ^{comment 7 pg 14}
CDH suggests characterization of one well in cluster in drainage.
characterize materials above water table - 2ft
composites to water table.
3. Data that failed to RPD of 35% of soil. DOE/EGG will
review data to determine if values are nearer to
DL or a decision point and will provide more explanation.
4. Comment 9, page 24. Trend charts with ARARS as ^(CDH recommends)
control bar. Definitely in IMIRA/DD Reference RCRA
BW monitoring report. Also provide upgradient/downgradient
well comparison. Possibly attach as an appendix if
not time-intensive.
5. Page 44 comment 38 - will be sampled 4 months. QC
will be conducted.
6. ~~clarification of the intended scope of the Leachate Collection~~
~~system,~~
6. If sandstone is encountered, perform drawdown test to
determine hydraulic conductivity.
7. CDH stressed the importance of the dam as a
migration boundary and suggests EGG/DOE identify
whether further investigation of dam integrity is
required.
8. Comment 4, page 11. Remove presumptive remedy
ties to fate and transport
9. Comment 4, page 13. Close out comment.
10. Comment 7, page 14, ~~an~~ appropriate SOP will be
referenced.
11. Comment 9, page 16 - EGG/DOE will look at available
data to determine if there are data gaps with
respect to placement of migration barriers
12. Comment 14, page 31. Matrix spike requirement will
be reviewed

- 3) the Landfill Closure and Leachate Collection schedules,

Leachate collection

341 - change to 5 days.

Dave Norbury ~~likes~~ schedule. does not find any problems with schedule.

But will not be formalized until PAH is accepted

Movement of soils within IHSS does not constitute placement.

- 4) the Proposed Action Memorandum outline,

To be discussed in August 25, 1991.

Arturo will discuss concurrent reviews with management

- 5) whether a 50% (Conceptual) or 95% (Title II) design should accompany the Action Memorandum,

PAM guidance doesn't specify, but for OU7 leachate collection system we will have a 95%.

- 6) whether CCR Health/Title 6, 1007-2, Part 2 siting requirements for Hazardous Waste Disposal Sites apply to the landfill closure design, and

No. ~~Yes~~ The requirements do not apply to this closure.

7) wetlands mitigation

wetlands mitigation will occur for leachate
and landfill projects at the same time
(with landfill closure)

Arturo Duan
Dave [unclear]
Dave [unclear]
[unclear] [unclear]

Activity 390 - decreased because of
presumptive remedies